

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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THOMAS GALLAGHER, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

OCULAR THERAPEUTIX, INC. et al.,

Defendants.

Case No: 1:17-cv-12288-GAO

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DYLAN CARAKER, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

OCULAR THERAPEUTIX, INC. et al.,

Defendants.

Case No: 1:17-CV-12146-GAO

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SHAWNA KIM, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiff,

v.

OCULAR THERAPEUTIX, INC. et al.,

Defendants.

Case No: No.: 1:17-CV-12286-GAO

**JOINT STIPULATION AND [PROPOSED] ORDER REGARDING SETTING  
BRIEFING SCHEDULE**

William L. Stephens, Kavita Mehta, and Oleg Tkalych (collectively, the “Ocular Investor Group”), Khaled Ramadan (“Ramadan,” and together with the Ocular Investor Group, “Co-Lead Plaintiff Movants”) and Ocular Therapeutix, Inc., Amarpreet Sawhney, George Migausky, Andrew Hurley, and Eric Ankerud (“Defendants,” and together with Co-Lead Plaintiff Movants,

the “Parties”), by and through their respective counsel, jointly submit this stipulation and [proposed] order regarding the schedule for Co-Lead Plaintiff Movants’ filing of a consolidated amended complaint in the above-captioned actions, for Defendants to answer or otherwise plead, and for any motion to dismiss briefing.

WHEREAS, a class action complaint for violations of the federal securities laws captioned *Gallagher v. Ocular Therapeutix, Inc. et al.*, Case No. 1:17-cv-12288-GAO (the “*Gallagher* Action”) is pending in this Court;

WHEREAS, a class action complaint for violations of the federal securities laws captioned *Caraker v. Ocular Therapeutix, Inc. et al.*, Case No. 1:17-cv-12146-GAO (the “*Caraker* Action”) is pending in this Court;

WHEREAS, a class action complaint for violations of the federal securities laws captioned *Kim v. Ocular Therapeutix, Inc. et al.*, Case No. 1:17-cv-12286-GAO (the “*Kim* Action”) is pending in this Court (*Gallagher*, *Caraker*, and *Kim* are collectively referred to as the “Related Actions”);

WHEREAS, on January 12, 2018, the Co-Lead Plaintiff Movants filed a motion seeking Co-Lead Plaintiff status and consolidation of the Related Actions (ECF No. 45);

WHEREAS, on January 24, 2018, Defendants responded to Co-Lead Plaintiff Movants’ January 12, 2018 motion by (i) consenting to the consolidation of the Related Actions, and (ii) stating that they take no position on the Co-Lead Plaintiff Movants’ request for appointment as co-lead plaintiffs and for approval of the Co-Lead Plaintiff Movants’ selection of lead counsel (ECF No. 50);

WHEREAS, subject to the Court’s approval, the Parties have agreed to the below schedule for the filing of a consolidated complaint and for Defendants response(s) thereto;

NOW THEREFORE, the Parties, by and through their undersigned counsel, hereby stipulate and agree, subject to this Court's approval, as follows:

1. A consolidated amended complaint ("CAC") shall be filed within sixty (60) days following the entry of an order appointing Lead Plaintiffs and Lead Counsel;
2. Defendants shall answer, move or otherwise respond to the CAC within sixty (60) days of the filing of the CAC; and
3. If Defendants file a motion to dismiss the CAC, Lead Plaintiffs shall oppose the motion to dismiss within sixty (60) days of the filing of the motion to dismiss; and
4. Defendants shall file any reply to Lead Plaintiffs' opposition within thirty (30) days of the filing of the opposition.

Dated: February 16, 2018

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s/ Daryl Andrews

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Dated: February 16, 2018

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Amarpreet Sawhney, George Migausky, Andrew  
Hurley, and Eric Ankerud*

**SO ORDERED.**

Dated: \_\_\_\_\_, 2018

\_\_\_\_\_  
Honorable George A. O'Toole  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on February 16, 2018.

/s/ Daryl Andrews  
Daryl Andrews